

EPA Appendix F - Risk Assessment # 31

Comment:

Section 8.3.5: The text here discusses the evaluation of potential risk to a "distant receptor." However, the first sentence below Table 8-4 describes the risks to a remediation worker.

Also, the text in the first paragraph states that the evaluation assumes the off-site receptor is exposed to the same air concentrations as the remediation worker. This is said to be a conservative approach, which it is. EPA wonders if it would be more transparent, however, to also include an evaluation of a true "distant receptor", taking distance from the landfill into account. As it now stands, the SFS contains no such evaluation of potential off-site receptors that are not landfill workers.

Discussion:

The cited text was offered to demonstrate that risks from airborne exposures to all receptors (including off-site receptors) were acceptable because inhalation risks to the RME receptor were acceptable. This screening approach has been removed from Appendix F and replaced with an alternate approach as requested by EPA reviewers.

Risks to a hypothetical receptor at the site boundary have been reevaluated by estimating air concentrations at the boundary and evaluating the risks to the target receptor from those concentrations. The evaluation includes effects from non-radioactive constituents and the inhalation and submersion exposure routes are considered in this updated quantitative evaluation.

Proposed Text Change:

The proposed changes to the risk assessment text and tables have been incorporated into the current draft of Appendix F. Sections 9-12 of Appendix F are currently being revised as updated information on schedules, material handling processes and transportation requirements become available.

EPA FEEDBACK:

EPA generally accepts the proposed changes; however, we will need to review the final SFS report to ensure the changes fully address this issue.